

EXHIBIT 5

Kevin Burdett

From: Kevin Burdett
Sent: Friday, June 3, 2022 2:50 PM
To: Ed Galang
Cc: gmullaney@mullaneylaw.com; David Braverman
Subject: Streamline v. VNY
Attachments: Plaintiff's Requests for Production of Documents to Defendants.pdf

Ed,

Pursuant to Judge Well's instructions, I am to provide you with a list of responsive documents that VNY still needs to produce. To be clear, Streamline expects VNY to comply with its discovery obligations and produce all documents responsive to Streamline's requests (in addition to actually providing a written response to Streamline's requests pursuant to FRCP 34). This list should not be construed to be a waiver of Streamline's rights or VNY's discovery obligations.

In addition to the other documents identified in our requests, please provide the following specific outstanding documents:

- All communications between VNY and Torin Verdone/Lori Verdone/Torin Verdone, Inc. relating to Streamline, the Mother Agent Agreement, the performance of Modeling Services by Torin Verdone, or any of the allegations in the Complaint or Answer.
- All documents and communications relating to the Model Management Agreement between Streamline and Torin Verdone, attached to the Complaint as Exhibit 1, including, but not limited to, any documents and/or communications relating to your claim that Mr. Verdone repudiated Model Management Agreement.
- All documents and communications relating to the performance of Modeling Services by Torin Verdone, including, but not limited to, all contracts, commission statements, and booking requests for the performance of Modeling Services by Torin Verdone.
- All documents and communications relating to any payments made or owed to Torin Verdone for Modeling Services, including, but not limited to, any documents relating to jobs and campaigns which may were left off VNY's spreadsheet (i.e. Tallia Orange campaign, etc.).
- All communications between you and Michelle Lee relating to Streamline.
- All supporting documents for commissions owed to Streamline for other models with Mother Agency Agreements (i.e. Onah Pleasants, Lauren Hall, Morgan Calcara, Colleen Cuthbertson, Bella Dunn, and any others).
- All communications between VNY and Onah Pleasants, Lauren Hall, Morgan Calcara, Colleen Cuthbertson, or Bella Dunn relating to Joseph Matthews or that model's representation by Streamline.

Please let me know if you have any questions or would like to discuss further. I look forward to receiving VNY's complete document production on June 17, 2022.

Thanks,

Kevin W. Burdett

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